

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

Thomas Sierra,

Plaintiff,

v.

Reynaldo Guevara et al.,

Defendants.

No. 18 C 3029

Hon. John Z. Lee,
District Judge

Hon. M. David Weisman,
Magistrate Judge

Parties' Joint Status Report

Pursuant to the Court's order (dkt. 212), the parties submit the following joint status report:

A. Current Deadlines

The deadline for fact discovery in this case is set for June 25, 2021. No deadlines for expert discovery or dispositive motions have been set. The parties are not requesting that this Court set expert discovery or dispositive motion deadlines at this time.

B. Progress of Discovery

The parties have continued to engage in written and oral discovery, including scheduling the depositions of third-party witnesses and issuing third-party document subpoenas. Depositions for third-party witnesses Jose E. Melendez and David Velasquez¹ are proceeding in March and April, and Plaintiff is working to coordinate

¹ Defendants object to Plaintiff intervening in another case to participate in a previously-scheduled deposition of Mr. Velasquez, a 404(b) witness. Plaintiff's position is that 404(b) witnesses such as Mr. Velasquez should not be subjected to serial depositions, given that the subject matter of their testimony will be the same across numerous pending cases against Detective Guevara, including this

dates for the depositions of third-party witnesses Lucy Montalvo and Tomas Sierra. Plaintiff has also requested dates for the depositions of Defendants Wojcik, McMurray, Figueroa, Mingey, and Biebel.

With respect to *Monell* discovery, Defendant City of Chicago completed its production of Area 5 homicide and CR files on January 22, 2021, and the parties are continuing to confer to ensure that this production is complete and accurate.

C. Pending Motions

There are no motions currently pending before the Magistrate Judge in this case. Plaintiff's Rule 72 objections regarding the production of *Klipfel* documents remain pending before the District Judge.

March 12, 2021

Respectfully submitted,

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Halvorsen, Wojcik,
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one. The parties are conferring about this issue and will present their dispute to the Court for resolution if they are unable to reach agreement.

/s/ Eileen E. Rosen

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